

U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

ESTATE OF JACK C. LUNNEEN, deceased,
by Thomas E. Lunneen, personal representative,

Plaintiff,

v

BERRIEN SPRINGS, a village, ORONOKO
TOWNSHIP, a municipal corporation, BERRIEN
COUNTY, a municipal corporation, JAMES WYSS,
in his individual capacity and in his official capacity
as officer for Berrien Springs-Oronoko Township
Police Department, ROGER JOHNSON, in his
individual capacity and in his official capacity as a
deputy for the Berrien County Sheriff's Department,
L. PAUL BAILEY, in his individual capacity and in
his official capacity as Sheriff of the Berrien County
Sheriff's Department, PAUL E. TOLIVER, in his
individual capacity and in his official capacity as
Chief of Police for the Berrien Springs Oronoko
Township Police Department, and JOHN DOES 1–
10, *in their individual and official capacities*,

Defendants.

CASE NO. 1:20-cv-01007

HON. HALA Y. JARBOU

MAG. JUDGE PHILLIP J. GREEN

MOTION TO WITHDRAW

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MOTION TO WITHDRAW

NOW COME Defendants, BERRIEN SPRINGS, ORONOKO TOWNSHIP, JAMES WYSS AND PAUL E. TOLIVER, by and through their attorneys, McGRAW MORRIS P.C., and hereby seek leave of the Court to withdraw attorney CHRISTOPHER J. RAITI as counsel for Defendants. In support of said motion, Defendants state as follows:

1. Christopher J. Raiti has concluded his employment with McGraw Morris P.C., the firm representing the Defendants.
2. Defendants will continue to be represented by G. Gus Morris of McGraw Morris P.C.
3. No party will be prejudiced if Christopher J. Raiti is permitted to withdraw his appearance in this matter.

WHEREFORE, Defendants respectfully request the Court enter an order permitting Christopher J. Raiti to withdraw his appearance as counsel in this matter.

Respectfully submitted,

McGRAW MORRIS P.C.

By: s/ G. GUS MORRIS
G. GUS MORRIS (P32960)
Attys for Defs Berrien Springs, Oronoko
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Dated: February 2, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2022, I caused to be served a copy of the attached MOTION TO WITHDRAW on behalf of Defendants, BERRIEN SPRINGS, ORONOKO TOWNSHIP, JAMES WYSS AND PAUL E. TOLIVER, with the Clerk of the Court using the ECF system that will send notification of such filing to all attorneys of record at the email addresses denoted on the Electronic Mail Notice List.

McGRAW MORRIS P.C.

By: /s/ G. GUS MORRIS
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